

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Objection Deadline: Nov. 9, 2023, at 4:00 p.m. (ET)

**SUMMARY COVER SHEET OF SECOND MONTHLY APPLICATION OF
WHITE & CASE LLP FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
AUGUST 1, 2023 TO AND INCLUDING AUGUST 31, 2023**

Name of Applicant:	White & Case LLP
Authorized to Provide Professional Services to:	Debtors and Debtors-in-Possession
Date of Retention:	Effective June 27, 2023
Period for Which Compensation and Reimbursement Are Requested:	August 1, 2023 – August 31, 2023
Total Amount of Compensation (100%):	\$1,923,539.00
Amount of Compensation Requested (80%):	\$1,538,831.20
Amount of Compensation Held Back (20%):	\$384,707.80
Amount of Expense Reimbursement Requested:	\$4,149.65
Aggregate Amount to be Paid Under Compensation Procedures Order:	\$1,542,980.85

This is a monthly fee application.

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

MONTHLY FEE APPLICATIONS FILED

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
		Requested		Approved On Monthly Basis		Holdback		Total Approved By Interim Order	
Date; D.I.	Period Covered	Fees	Expenses	Fees	Expenses	Fees	Expenses	Fees	Expenses
9/13/2023 D.I. 422	6/27/2023 – 7/31/2023	\$2,296,617.00	\$4,880.64	\$1,837,293.60	\$4,880.64	\$459,323.40	\$0	TBD	TBD

**SUMMARY OF TOTAL FEES AND HOURS
BY ATTORNEYS AND PARAPROFESSIONALS**

Name	Title	Year Admitted	Areas of Expertise	Hours	Rate	Fees
Cieply, Adam	Partner	2010	M&A - Corporate Practice	16.2	\$1,460.00	\$23,652.00
Garr, Laura	Partner	2010	Commercial Litigation Practice	30.8	\$1,370.00	\$42,196.00
Gorsich, Ronald	Partner	2001	Financial Restructuring & Insolvency (FRI) Practice	19.9	\$1,370.00	\$27,263.00
Green, Jesse	Counsel	2007	Commercial Litigation Practice	137.3	\$1,310.00	\$179,863.00
Hanson, Erin	Partner	2010	Technology Transactions Practice	35.0	\$1,460.00	\$51,100.00
He, Fan	Counsel	2007	Financial Restructuring & Insolvency (FRI) Practice	97.9	\$1,310.00	\$128,249.00
Iloegbunam, Michael	Associate	2022	Tax Practice	13.0	\$830.00	\$10,790.00
Kampfner, Roberto	Partner	1995	Financial Restructuring & Insolvency (FRI) Practice	77.1	\$1,590.00	\$122,589.00
Kane, Alanna	Associate	2023	Pool Associates - Litigation	24.1	\$740.00	\$17,834.00
Kaul, Sequoia	Associate	2018	Commercial Litigation Practice	14.5	\$1,060.00	\$15,370.00
Kim, David	Associate	2021	Financial Restructuring & Insolvency (FRI) Practice	33.6	\$960.00	\$32,256.00
Kim, Doah	Associate	2012	Financial Restructuring & Insolvency (FRI) Practice	106.4	\$1,270.00	\$135,128.00
Lauria, Thomas	Partner	1987	Financial Restructuring & Insolvency (FRI) Practice	47.8	\$2,100.00	\$100,380.00
Ludovici, Stephen	Associate	2014	Financial Restructuring & Insolvency (FRI) Practice	12.9	\$1,240.00	\$15,996.00
Mezei, Livy	Associate	2017	Financial Restructuring & Insolvency (FRI) Practice	28.3	\$1,020.00	\$28,866.00
Padmanabhan, Aditi	Associate	2023	Pool Associates - Litigation	13.9	\$740.00	\$10,286.00
Pryor, Gregory	Partner	1989	M&A - Corporate Practice	40.3	\$1,950.00	\$78,585.00
Saunders, Coleman	Associate	2021	Commercial Litigation Practice	49.9	\$960.00	\$47,904.00
Shu, Cathy	Associate	2022	Financial Restructuring & Insolvency (FRI) Practice	10.5	\$740.00	\$7,770.00
Strom, Peter	Associate	2021	Financial Restructuring & Insolvency (FRI) Practice	51.3	\$960.00	\$49,248.00
Szuba, RJ	Associate	2017	Financial Restructuring & Insolvency (FRI) Practice	142.7	\$1,140.00	\$162,678.00
Turetsky, David	Partner	2003	Financial Restructuring & Insolvency (FRI) Practice	161.9	\$1,750.00	\$283,325.00
Wick, Katie	Legal Assistant	N/A	Financial Restructuring & Insolvency (FRI) Practice	11.4	\$380.00	\$4,332.00
Yu, Stanley	Associate	N/A	Technology Transactions Practice	35.0	\$1,140.00	\$39,900.00
Zakia, Jason	Partner	1999	Commercial Litigation Practice	164.7	\$1,750.00	\$288,225.00
Zhang, Shirley	Associate	2022	M&A - Private Equity Practice	23.8	\$830.00	\$19,754.00
Grand Total				1,400.2		\$1,923,539.00

STATEMENT OF FEES AND HOURS BY PROJECT CATEGORY

Cat. No.	Project Category Description	Total Hours	Total Fees
B01	Asset Analysis, Sale & Disposition	85.9	\$112,645.00
B02	Automatic Stay Issues	0.0	\$0.00
B03	Avoidance Actions & Other Asset Recovery	0.0	\$0.00
B04	Business Operations, Vendor & Utility Issues	12.4	\$16,165.00
B05	Case Administration	11.0	\$13,302.00
B06	Case Strategy	19.0	\$27,676.00
B07	Claims Administration & Objections	27.4	\$33,478.00
B08	Corporate Advice & Board Meetings	27.2	\$45,293.00
B09	Creditor Meetings & Statutory Committees	110.0	\$113,730.00
B10	Disbursement	0.0	\$0.00
B11	Discovery	0.0	\$0.00
B12	Exclusivity, Plan & Disclosure Statement	226.1	\$319,659.00
B13	Executory Contracts & Unexpired Leases	37.2	\$45,500.00
B14	First Day Pleadings	0.0	\$0.00
B15	Hearings & Court Matters	86.7	\$144,920.00
B16	Insurance Issues	2.7	\$4,437.00
B17	Litigation	578.7	\$818,819.00
B18	Nonworking Travel	0.0	\$0.00
B19	Professional Retention & Fees – W&C	18.8	\$18,792.00
B20	Professional Retention & Fees – Other	27.7	\$36,675.00
B21	Reports, Schedules & U.S. Trustee Issues	112.9	\$155,021.00
B22	Tax Issues	11.7	\$10,243.00
B23	Employee Issues	4.8	\$7,184.00
Grand Total		1,400.2	\$1,923,539.00

EXPENSE SUMMARY

Category	Amount
Airfare	\$981.80
Bus - Out of Town	\$78.98
Business Meals	\$25.00
Car Rental	\$112.21
Computer Services	\$20.00
Hotel Expense	\$1,804.58
Overtime Meals	\$107.90
Professional Service	\$665.48
Taxi - Business	\$322.83
Taxi - Overtime	\$30.87
Grand Total	\$4,149.65

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Debtors.

Chapter 11

Case No. 23-10831 (MFW)

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Objection Deadline: Nov. 9, 2023, at 4:00 p.m. (ET)

**SECOND MONTHLY APPLICATION OF WHITE & CASE LLP FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD AUGUST 1, 2023 TO AND INCLUDING AUGUST 31, 2023**

White & Case LLP (“**White & Case**”), counsel for the debtors and the debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, hereby files this second monthly application (this “**Application**”) for the period from August 1, 2023 to and including August 31, 2023 (the “**Compensation Period**”) requesting (a) interim allowance and payment of compensation for professional services to the Debtor in the amount of \$1,542,980.85, representing 80% of the \$1,923,539.00 of fees earned by White & Case for professional services to the Debtors during the Compensation Period, and (b) reimbursement of 100% of the actual and necessary expenses incurred by White & Case during the Compensation Period in connection with such services in the amount of \$4,149.65. In support of this Application, White & Case respectfully represents as follows:

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

JURISDICTION, VENUE AND PREDICATES FOR RELIEF

1. This Court has jurisdiction to consider this Application under 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, dated February 29, 2012 (Sleet, C.J.). This is a core proceeding under 28 U.S.C. § 157(b). Venue of the Chapter 11 Cases and this Application is proper in this District under 28 U.S.C. §§ 1408 and 1409.

2. The predicates for the relief requested by this Application are sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals and Committee Members* [Docket No. 181] (the “**Compensation Procedures Order**”).

BACKGROUND

3. On June 27, 2023 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (collectively, the “**Chapter 11 Cases**”). The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b). The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. On July 11, 2023, the Office of the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed the official committee of unsecured creditors (the “**Creditors’ Committee**”) for these Chapter 11 Cases. On September 7, 2023, the U.S. Trustee appointed the official committee of equity security holders (the “**Equity Committee**” and

collectively with the Creditors' Committee, the "**Committees**") for these Chapter 11 Cases. No trustee or examiner has been appointed in these Chapter 11 Cases.

4. The Court has authorized the Debtors to retain and employ White & Case as their lead bankruptcy counsel, effective as of the Petition Date, pursuant to the *Order Authorizing the Employment and Retention of White & Case LLP as Attorneys to the Debtors Effective as of the Petition Date* [Docket No. 175] (the "**Retention Order**"). The Retention Order authorizes the Debtors to compensate and reimburse White & Case in accordance with the terms and conditions set forth in the Debtors' application to retain White & Case, subject to White & Case's application to the Court.

5. On July 25, 2023, the Court entered the Compensation Procedures Order, which provides, among other things, that each chapter 11 professional seeking interim compensation in the Chapter 11 Cases may file an application (a "**Monthly Fee Application**") for interim approval and allowance of compensation for services rendered and reimbursement of expenses incurred during the immediately preceding month and serve a copy of such Monthly Fee Application on the Notice Parties (as defined in the Compensation Procedures Order). Then, each Notice Party will have until 4:00 p.m. (prevailing Eastern Time) on the twentieth (20th) day after service of a Monthly Fee Application to object thereto (the "**Objection Deadline**"). Upon expiration of the Objection Deadline, the professional may file a certificate of no objection consistent with Local Rule 9013-1(j) with the Court after which the Debtors are authorized to pay each professional an amount equal to the lesser of: (i) 80 percent (80%) of the fees and 100 percent (100%) of the expenses requested in the Monthly Fee Application; and (ii) 80 percent (80%) of the fees and 100 percent (100%) of the expenses not subject to an objection.

RELIEF REQUESTED

6. By this Application, in accordance with the Compensation Procedures Order, White & Case requests payment in the aggregate amount of \$1,542,980.85, which is equal to (a) 80% of the \$1,923,539.00 of fees earned by White & Case for professional services to the Debtors during the Compensation Period; and (b) 100% of the \$4,149.65 of actual and necessary expenses incurred by White & Case during the Compensation Period in connection with its services to the Debtors.

SUMMARY OF SERVICES RENDERED

7. Prior to filing this Application, White & Case reviewed its fees worked (which totaled 1,758.6 hours and \$2,348,155.00). Following that review, White & Case voluntarily elected to reduce its fees by 358.4 hours and \$424,616.00 (~18.1%) prior to filing this Application. White & Case will not hereafter seek payment for the fees that it has voluntarily reduced.

8. Attached hereto as **Exhibit A** is a detailed statement of White & Case's hours expended and fees earned during the Compensation Period. A summary of White & Case's hours expended and fees earned during the Compensation Period grouped by category (discussed below) are in the summary cover sheets prefixed to this Application. The attorneys and paraprofessionals who provided services to the Debtors during the Compensation Period are also identified in **Exhibit A** and in the summary cover sheets. The services rendered by White & Case during the Compensation Period are grouped into the categories set forth in **Exhibit A** and in the summary cover sheets prefixed to this Application. The following is a brief narrative summary of the services performed by White & Case professionals and paraprofessionals on behalf of the Debtors during the Compensation Period, organized by category:

No.	Category Name
	Brief Narrative Summary
B01	Asset Analysis, Sale & Disposition
	During the Compensation Period, White & Case advised the Debtors on numerous issues related to the Debtors' marketing and sale process with respect to their assets, as well as other matters. Among other things, White & Case advised the Debtors with respect to legal matters relating to the preparation of an asset purchase agreement and sale order in connection with the sale process, the Debtors' interactions with potential bidders and the marketing and potential sale of their assets, and communicated with the Creditors' Committee counsel regarding the same.
B02	Automatic Stay Issues
	During the Compensation Period, White & Case billed no time to this project category.
B03	Avoidance Actions & Other Asset Recovery
	During the Compensation Period, White & Case billed no time to this project category.
B04	Business Operations, Vendor & Utility Issues
	During the Compensation Period, White & Case advised the Debtors with respect to various matters related to the Debtors' remaining operations, including with respect to issues concerning vendors and suppliers. The efforts have permitted the Debtors to address various issues relating to the Debtors' vendors, including with respect to their critical vendors.
B05	Case Administration
	During the Compensation Period, White & Case professionals and paraprofessionals worked on various matters related to the management of these Chapter 11 Cases, including responding to creditor and equity holder inquiries, preparing and updating a case calendar, maintaining an FTP site for documents and diligence, and tracking and monitoring work in progress.
B06	Case Strategy
	During the Compensation Period, White & Case professionals advised the Debtors with respect to legal matters concerning strategy with respect to the Chapter 11 Cases. Among other things, White & Case team members participated twice-weekly calls team calls with the Debtors and their other professionals and in daily internal meetings to address open issues and case strategy. These initiatives have allowed the Debtors and their professionals to remain coordinated and to advance the Debtors' strategy and objectives in the Chapter 11 Cases.
B07	Claims Administration & Objections

	During the Compensation Period, White & Case attorneys advised the Debtors with respect to various matters concerning claims and the claims administration process, including preparation of a bar date motion and procedures, responding to the U.S. Trustee's comments to the motion to establish the bar date in these Chapter 11 Cases, ensuring entry of the final bar date order with the Court, drafting and publishing notice of the bar date, and researching and analyzing the treatment of certain creditor claims in connection with a chapter 11 plan.
B08	Corporate Advice & Board Meetings
	During the Compensation Period, White & Case professionals advised the Debtors with respect to certain corporate and board matters, including advising the Debtors at Board meetings and preparing materials in connection with such meetings. These efforts have, among other things, assisted the Debtors' board of directors in remaining properly informed of the events of these Chapter 11 Cases and thereby in discharging their fiduciary duties.
B09	Creditor Meetings & Statutory Committees
	During the Compensation Period, White & Case responded to various inquiries, requests for information, and issues raised by the Creditors' Committee regarding the Debtors and the Chapter 11 Cases, including by assisting the Debtors' in reviewing for privilege and producing documents that were responsive to the Creditors' Committee's document requests. White & Case professionals also participated on numerous calls with the Creditors' Committee's professionals regarding the Debtors' first day orders, second day relief, and pending litigation, including the actions involving Foxconn and Karma. These efforts assisted the Creditors' Committee's professionals in keeping advised with respect to the Chapter 11 Cases and in advising the Creditors' Committee. White & Case also advised the Debtors in responding to requests to the U.S. Trustee for the appointment of the Equity Committee (and the U.S. Trustee's follow-up inquiries concerning such requests).
B10	Disbursement
	During the Compensation Period, White & Case billed no time to this project category.
B11	Discovery
	During the Compensation Period, White & Case billed no time to this project category.
B12	Exclusivity, Plan & Disclosure Statement
	During the Compensation Period, White & Case continued to prepare the Debtors' proposed chapter 11 plan and disclosure statement, which were both filed one day after the end of the Compensation period. In connection with the proposed plan and disclosure statement, White & Case diligently analyzed issues related to tax and claim treatment issues. White & Case also led the Debtors' discussions and negotiations with the Creditors' Committee concerning the proposed plan and disclosure statement. White &

	Case began preparing the motion to approve the adequacy of the disclosure statement and form of chapter 11 plan solicitation procedures.
B13	Executory Contracts & Unexpired Leases
	During the Compensation Period, White & Case advised the Debtors on issues related to the Debtors' executory contracts and unexpired leases. For example, White & Case professionals reviewed and analyzed certain license, real estate lease agreements, and other contracts and agreements, in connection with issues relating to the Chapter 11 Cases. White & Case also prepared a notice for all leases and contracts that may be assumed and assigned in connection with the sales process advising counterparties of cure amounts in connection their contracts.
B14	First Day Pleadings
	During the Compensation Period, White & Case billed no time to this project category.
B15	Hearings & Court Matters
	During the Compensation Period, White & Case prepared for and represented the Debtors in contested hearings on August 3, 2023 (relating to the Debtors' motion to extend the automatic stay to Delaware litigation against officers and directors) and August 28, 2023 (relating to Foxconn's motion to dismiss or convert the Chapter 11 Cases) and the scheduling conference (concerning Foxconn's motion to dismiss) on August 15, 2023.
B16	Insurance Issues
	During the Compensation Period, White & Case reviewed and advised the Debtors in connection with insurance policies and related matters involving the Debtors' insurance.
B17	Litigation
	During the Compensation Period, White & Case advised the Debtors regarding various pending litigation matters, including Foxconn's motion to dismiss or convert the Chapter 11 Cases and chapter 11 matters relating to the securities class actions against the Debtors (as well as efforts to resolve them) and the adversary proceeding to extend the automatic stay to the Debtors' current and former directors and officers. White & Case also advised the Debtors in connection with the negotiation and implementation of the Debtors' settlement to resolve Karma's litigation and \$900 million claim and obtaining Court approval of that settlement pursuant to Bankruptcy Rule 9019 on shortened notice, which successfully resolved Karma's claim at a fraction of its asserted value.
B18	Nonworking Travel
	During the Compensation Period, White & Case billed no time to this project category.
B19	Professional Retention & Fees – W&C
	During the Compensation Period, White & Case prepared its first monthly fee application.

B20	Professional Retention & Fees – Other
	During the Compensation Period, White & Case advised the Debtors in connection with applications for employment of Silverman Consulting as financial advisor, Jefferies LLC as investment banker, Kurtzman Carson Consultants LLC as claims and noticing agent and administrative advisor, Baker Hostetler LLP as special corporate counsel, KPMG LLP as auditor, and Troutman Pepper as Creditors’ Committee counsel. White & Case also advised the Debtors with respect to professionals utilized in the ordinary course of the Debtors’ business.
B21	Reports, Schedules & U.S. Trustee Issues
	During the Compensation Period, White & Case assisted the Debtors in preparing and filing amendments to their previously-filed schedules and statements of financial affairs. White & Case professionals also worked with the Debtors, Silverman Consulting and other professionals to prepare and file (as applicable) monthly operating report for July. In addition, White & Case coordinated with Baker Hostetler regarding the necessary corporate filings with the U.S. Securities and Exchange Commission. These efforts assisted the Debtors in responding to the U.S. Trustee’s information inquiries and in complying with the reporting and other requirements associated with operating in chapter 11.
B22	Tax Issues
	During the Compensation Period, White & Case advised the Debtors in connection with tax matters, including matters relating to the Debtors’ significant tax attributes. In connection therewith, White & Case professionals analyzed related tax and finance documents and conferred with other professionals including KPMG.
B23	Employee Issues
	White & Case advised the Debtors on various employee-related issues, including severance, wage issues, and other matters.

9. White & Case attorneys and paraprofessionals billed a total of 1,400.2 hours in connection with these Chapter 11 Cases during the Compensation Period. All services rendered by White & Case for which compensation is sought pursuant to this Application were rendered solely to or on behalf of the Debtors. No payments were received by White & Case from any other source for services rendered or to be rendered in connection with these Chapter 11 Cases.

ACTUAL AND NECESSARY EXPENSES

10. Attached as **Exhibit B** is a detailed statement of White & Case's out-of-pocket expenses incurred during the Compensation Period, totaling \$4,149.65. These expenses include, but are not limited to, airfare, hotel expenses, travel expenses, taxis, overtime meals and related professional services.

VALUATION OF SERVICES

11. As noted above, the amount of time spent by each White & Case attorney and paraprofessional providing services to the Debtors during the Compensation Period is set forth in the summary cover sheets hereto. The rates reflected thereon are White & Case's customary hourly rates for work of this character. The reasonable value of the services rendered by White & Case for which White & Case seeks compensation for the Compensation Period as attorneys to the Debtors in these Chapter 11 Cases is \$1,923,539.00. The blended rate for compensation requested in this Application is approximately \$1,374.²

12. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the fees requested are fair and reasonable given (a) the complexity of these Chapter 11 Cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under this title.

13. Although White & Case has made every effort to include all fees earned and expenses incurred during the Compensation Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Compensation Period. White & Case reserves the right to make further applications to this Court for allowance

² The blended rate is calculated by taking the total of fees included in this Monthly Fee Application and dividing by the total of hours included in this Monthly Fee Application, rounded to the nearest dollar.

of such fees and expenses not included herein. Subsequent fee applications will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Compensation Procedures Order.

CERTIFICATION OF COMPLIANCE

14. The undersigned has reviewed the requirements of Local Rule 2016-2 and certifies that, to the best of his knowledge, information, and belief, this Application complies with the requirements of that Local Rule.

WHEREFORE, White & Case requests allowance and payment of the aggregate amount of \$1,542,980.85, which is equal to (a) 80% of the \$1,923,539.00 of fees earned by White & Case for professional services to the Debtors during the Compensation Period; and (b) 100% of the \$4,149.65 of actual and necessary expenses incurred by White & Case during the Compensation Period in connection with its services to the Debtors.

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Dated: October 20, 2023

Respectfully submitted,

/s/David M. Turetsky

WHITE & CASE LLP

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